

Designation Run Report

Brown, Vic - Merged DC PComp 5-27-21 330p

Brown, Vic 07-08-2020

Defendants' Counters 00:45:22

Plaintiffs' Completeness 00:06:33

Total Time 00:51:55



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15:02 - 15:10	Brown, Vic 07-08-2020 (00:00:24) 15:2 When I use the term "diversion," do you 15:3 know -- are you familiar with that term? 15:4 A. Certainly, yes. 15:5 Q. What does that mean to you? 15:6 A. Prescription medication that is diverted 15:7 from its original intent of medicinal use to other 15:8 persons or for other uses. 15:9 Q. Okay. And is diversion a crime? 15:10 A. Yes, it is.	VM12a.1
33:18 - 34:06	Brown, Vic 07-08-2020 (00:00:39) 33:18 Q. Do you understand that McKesson, 33:19 AmerisourceBergen and Cardinal Health are licensed 33:20 distributors of controlled substances, including 33:21 prescription? Opioids? 33:22 A. Yes, I was aware of that. 33:23 Q. And do you understand that that means that 33:24 they purchase controlled substances from 34:1 manufacturers and sell them to pharmacies? 34:2 A. Yes. 34:3 Q. And then pharmacies distribute those 34:4 controlled substances to patients based on 34:5 prescriptions written from physicians? 34:6 A. Yes.	VM12a.2
34:13 - 35:21	Brown, Vic 07-08-2020 (00:01:40) 34:13 Q. Do you have any personal knowledge of any 34:14 distribution of prescription medications by any of 34:15 the defendants in this case? 34:16 A. I do not. 34:17 Q. Do you have any personal knowledge of any 34:18 wrongdoing or alleged wrongdoing by any of the 34:19 defendants in this case? 34:20 A. I do not. 34:21 Q. Do you have any knowledge about the systems 34:22 that any of the defendants have in place to prevent 34:23 diversion of prescription opioids? 34:24 A. I do not. 35:1 Q. And so I'm assuming then that because you 35:2 don't have any knowledge of those systems, you're 35:3 not able to identify any aspects of those systems	VM12a.3

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35:4 that you would consider to be defective -- or

35:5 anything like that?

35:6 A. That's correct. I would not.

35:7 Q. Do you know anything about what information

35:8 any of the defendants in this case reported to the

35:9 DEA?

35:10 A. I do not.

35:11 Q. Do you have any knowledge about what

35:12 information the defendants were required to report

35:13 to the DEA?

35:14 A. I do not.

35:15 Q. Do you know anything about what information

35:16 any of the defendants in this case were required to

35:17 report to the State of West Virginia?

35:18 A. I do not.

35:19 Q. Or the information that they reported to

35:20 the State of West Virginia?

35:21 A. No, I do not.

38:05 - 38:08

Brown, Vic 07-08-2020 (00:00:13)

VM12a.4

38:5 Q. Do you know where the -- what are the

38:6 places of origin of the illegal fentanyl that

38:7 you're seeing now?

38:8 A. The vast majority --

38:15 - 38:17

Brown, Vic 07-08-2020 (00:00:08)

VM12a.5

38:15 A. Just generally speaking, a large portion of

38:16 it comes from China, shipped from China. And

38:17 that's public knowledge, obviously.

39:04 - 40:02

Brown, Vic 07-08-2020 (00:01:12)

VM12a.6

39:4 Q. And we talked a little bit already about

39:5 the term "diversion" and what that means. So does

39:6 a person who diverts a pharmaceutical drug, that's

39:7 a crime, correct?

39:8 A. Correct.

39:9 Q. And does the person who possesses a

39:10 diverted pharmaceutical drug and uses the drug

39:11 without a legitimate medical purpose also commit a

39:12 crime?

39:13 A. Yes.

39:14 Q. And what are some ways that diversion can

39:15 occur?

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39:16 A. Well, certainly an individual that is
 39:17 prescribed the medication legitimately can then
 39:18 bring that drug back, sell the drug, give the drug
 39:19 away. It can be stolen from a pharmacy, diverted
 39:20 in that manner.
 39:21 It can be stolen from a distributor.
 39:22 False prescriptions can be obtained or written by
 39:23 an individual, taken to a pharmacy and the -- many
 39:24 times, the prescription may or may not be filled;
 40:1 then those drugs are diverted from its intended
 40:2 purpose.

40:11 - 40:14

Brown, Vic 07-08-2020 (00:00:10)

VM12a.7

40:11 Q. And have you seen examples of all the
 40:12 various types of diversion that you just describe
 40:13 during your career?

40:14 A. Yes.

42:16 - 44:20

Brown, Vic 07-08-2020 (00:02:37)

VM12a.8

42:16 Q. All right. So what is a high-intensity
 42:17 drug trafficking area?
 42:18 A. Well, in 1988, Congress, through the
 42:19 anti-drug abuse act, formed the HIDTA program. At
 42:20 that time, they formed five HDTAs, and they put
 42:21 those HDTAs at what was then thought to be the
 42:22 gateway areas throughout the country that drugs
 42:23 were distributed.
 42:24 Some were along the southwest border to
 43:1 try to interdict the drugs as they come into the
 43:2 country. There was one in Florida. Obviously, if
 43:3 you think back to the late '80s, that's when the
 43:4 cocaine epidemic was at its highest -- to intercept
 43:5 the drugs coming from the Caribbean and Mexico.
 43:6 And then other major spots. Over the
 43:7 course of the next 30 years -- there's now 29
 43:8 HDTAs across the nation with every state
 43:9 represented to some degree in the HIDTA program.
 43:10 And the purpose of the HIDTA program is
 43:11 to bring state and local and federal agencies
 43:12 together, working under one umbrella, co-located
 43:13 and commingled, to fight the drug epidemic.
 43:14 It breaks down barriers to have all of

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43:15 those different agencies housed together, you know,
 43:16 federal, state and local agencies, to form a task
 43:17 force to investigate drug trafficking
 43:18 organizations.
 43:19 Appalachia HIDTA, if you want any more
 43:20 clarification -- want me to stop, just let me know.
 43:21 But Appalachia HIDTA became into existence in 1998.
 43:22 It was designated by the Office of National Drug
 43:23 Control Policy to be a marijuana HIDTA only.
 43:24 At that time, the Appalachian region
 44:1 was the number one marijuana-producing region in
 44:2 the nation, so they obligated federal funds to try
 44:3 to eradicate the marijuana before it was
 44:4 disseminated across the nation.
 44:5 Obviously, the amount of marijuana that
 44:6 was produced in this region was not all consumed
 44:7 here; it was being shipped across the nation. So
 44:8 at that time, it was simply a marijuana HIDTA.
 44:9 In 2002, it became a poly-drug HIDTA
 44:10 just like every other HIDTA because of the
 44:11 emergency drug threats that the Appalachian region
 44:12 had. Each HIDTA is governed by an executive board,
 44:13 and that executive board determines how the funds
 44:14 will be spent by the HIDTA that's received from
 44:15 ONDCP.
 44:16 So ONDCP doesn't put any stipulations
 44:17 on the funding once it's given to HIDTA, it's
 44:18 solely up to the executive board to determined how
 44:19 those funds are spent and which threat needs to be
 44:20 addressed.

45:14 - 46:01

Brown, Vic 07-08-2020 (00:00:44)

VM12a.9

45:14 Q. Was 1998 when Appalachia HIDTA was
 45:15 created? Is that when Huntington and Cabell County
 45:16 were first included in a HIDTA?
 45:17 A. That's correct.
 45:18 Q. And you told us that that was a
 45:19 marijuana-only HIDTA?
 45:20 A. That's correct. Until 2002.
 45:21 Q. And then in two thousand -- and has -- have
 45:22 Huntington and Cabell County continuously been

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	45:23 within the geography of Appalachia HIDTA since 45:24 1998?	
46:02 - 46:18	46:1 A. Yes. Brown, Vic 07-08-2020 (00:00:50) 46:2 Q. Are there specific requirements for a HIDTA 46:3 designation? 46:4 A. Yes, there are. There are four criteria -- 46:5 and I couldn't articulate those four verbatim. But 46:6 the one that is most -- sometimes most difficult to 46:7 articulate to ONDCP to get a HIDTA designation is 46:8 the area being considered for a designation has to 46:9 affect the rest of the nation with drug 46:10 trafficking. 46:11 It can't just be a localized drug 46:12 problem. You have to articulate how it has 46:13 international or national implications and affects 46:14 the rest of the nation with drug trafficking. 46:15 In other words, you have to be able to 46:16 articulate how drug trafficking organizations are 46:17 operating in that area that have tentacles in other 46:18 locations, basically.	VM12a.10
46:19 - 47:14	Brown, Vic 07-08-2020 (00:00:58) 46:19 Q. So what are the benefits of participation 46:20 in a HIDTA program? I mean, it sounds like funding 46:21 is one. 46:22 A. Funding is one, but the information sharing 46:23 between the federal, state and local agencies 46:24 working together as one unified task force brings 47:1 all of their assets together and enhances their 47:2 ability to investigate. 47:3 Many times -- for example, a local 47:4 agency that's -- such as Huntington, for an 47:5 example, that's experiencing a horrendous drug 47:6 problem may not have the ability to follow up with 47:7 a lot of the drug trafficking organizations that 47:8 are operating outside of their scope of area, so by 47:9 bringing the federal agencies - the DEA, the FBI 47:10 and the State Police - in together, working 47:11 together as a unified task force, brings the 47:12 resources of all those agencies together, allows	VM12a.11

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47:15 - 47:20	<p>47:13 them to follow up on investigations out of state, 47:14 even out of country, if necessary.</p> <p>Brown, Vic 07-08-2020 (00:00:18)</p> <p>47:15 Q. What is the mission of Appalachia HIDTA? 47:16 A. To dismantle drug trafficking 47:17 organizations, paraphrasing. Basically all of our 47:18 funding is supposed to go to the dismantlement or 47:19 disruption of drug trafficking organizations that 47:20 are affecting the designated area.</p>	VM12a.12
51:13 - 51:19	<p>Brown, Vic 07-08-2020 (00:00:22)</p> <p>51:13 Q. So what is the geographic reach of 51:14 Appalachia HIDTA currently? 51:15 A. We have 90 counties that are designated in 51:16 our four states, 20 of which are in West Virginia 51:17 that are designated as HIDTA that we are allowed to 51:18 provide funding to or expend our funds in those 51:19 counties.</p>	VM12a.13
59:19 - 59:21	<p>Brown, Vic 07-08-2020 (00:00:15)</p> <p>59:19 Q. So Mr. Brown, has there ever been a time 59:20 when the abuse of illegal drugs was not a problem 59:21 in the Appalachia HIDTA region?</p>	VM12a.14
59:23 - 60:17	<p>Brown, Vic 07-08-2020 (00:00:55)</p> <p>59:23 A. Not in my career, no. 59:24 Q. And when you say not in your career, what 60:1 year are you starting that? 60:2 A. Well, as far back as I'm aware, there's 60:3 always been drug problems. We've never been a 60:4 drug-free Appalachia, I don't think, since my 60:5 birth. So it was certainly -- in my professional 60:6 experience, there's always been a drug problem. 60:7 Q. What about in Cabell County? Do you know 60:8 when there's ever been a time when the abuse of 60:9 illegal drugs was not a problem in Cabell County? 60:10 A. I don't have direct knowledge of that. 60:11 Obviously, I think like every area in Appalachia, 60:12 there's always been a drug problem; it's just that 60:13 different types, obviously, emerge and come to 60:14 light more so than others. 60:15 Q. And would that also be true for the City of 60:16 Huntington?</p>	VM12a.15

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66:14 - 66:15	60:17 A. Yes, I would think so, yes. Brown, Vic 07-08-2020 (00:00:09)	VM12a.16
68:20 - 69:03	66:14 Q. All right. Let's take a look at the 66:15 Exhibit 2, which is the 2000 Annual Report, please. Brown, Vic 07-08-2020 (00:00:23) 68:20 Q. And it says "The three states that 68:21 constitute the Appalachia HIDTA are experiencing an 68:22 increase in the methamphetamine threat." 68:23 A. Yes. 68:24 Q. "An upsurge in methamphetamine seizures and 69:1 lab discoveries have also been reported in Kentucky 69:2 and" in "West Virginia." 69:3 A. Yes. Brown, Vic 07-08-2020 (00:00:12)	VM12a.17
69:04 - 69:06	69:4 Q. So is it your understanding then that 69:5 methamphetamine posed a threat to Appalachia HIDTA 69:6 as far back as 2000? Brown, Vic 07-08-2020 (00:01:53)	VM12a.18
69:08 - 70:16	69:8 A. That is correct. Methamphetamine, we had a 69:9 severe problem with the small one-step labs. 69:10 During that time, a lot of individuals were making 69:11 their own meth because of the ease and the 69:12 availability of the precursors that they could 69:13 assemble those products with. 69:14 Now with legislation that's occurred 69:15 over the years, that has been curtailed, but we see 69:16 an influx of powder methamphetamine now from the 69:17 southwest border, obviously it's overtaking this 69:18 threat that's mentioned in this document. 69:19 Q. So to HIDTA's knowledge, when did 69:20 methamphetamine first become a threat? 69:21 A. Well, I would say prior to the HIDTA's 69:22 designation even. It's been an ongoing issue for 69:23 years and years in this region, as I said, because 69:24 of the ease and the availability of the precursors 70:1 that were -- that could be used to make the meth. 70:2 Q. And then -- I -- go ahead. I'm sorry. 70:3 A. There was obviously a time that that became 70:4 more prevalent than others. I would say, and I'm 70:5 just roughly five years ago with legislation in	VM12a.19

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70:6 many states that removed the availability of the
 70:7 precursors pretty much eradicated the one-step labs
 70:8 that were occurring everywhere and that was taking
 70:9 so much attention and investigative time of law
 70:10 enforcement to address that threat and the danger
 70:11 to the officers involved in the dismantling of the
 70:12 meth labs.

70:13 But in the last five years, that
 70:14 problem has almost went to zero as far as one-step
 70:15 labs. It's all imported methamphetamine from the
 70:16 southwest border now.

71:04 - 71:12

Brown, Vic 07-08-2020 (00:00:36)

VM12a.20

71:4 Q. And has -- I think you've told me this, but
 71:5 has meth in one form or another been a threat in
 71:6 the Appalachia HIDTA region from before Appalachia
 71:7 HIDTA was created through today?

71:8 A. Yes.

71:9 Q. And the defendants in this case - Cardinal,
 71:10 McKesson and AmerisourceBergen - do not distribute
 71:11 methamphetamine, correct?

71:12 A. Correct.

72:13 - 73:06

Brown, Vic 07-08-2020 (00:01:03)

VM12a.21

72:13 Q. So is it Appalachia HIDTA's understanding
 72:14 that imported cocaine and crack cocaine were
 72:15 threats facing the Appalachia HIDTA region as far
 72:16 back as 2001?

72:17 A. Yes. I would say so.

72:18 Q. What about before 2001? Were cocaine --
 72:19 imported cocaine and crack cocaine threats in the
 72:20 Appalachia HIDTA region?

72:21 A. They were. Obviously before my time with
 72:22 the program, but obviously they were indeed
 72:23 problems, yes.

72:24 Q. All right. So has cocaine and crack
 73:1 cocaine, have they been threats continuously since
 73:2 at least 2001 until the present?

73:3 A. Yes.

73:4 Q. And same question I asked you before. The
 73:5 defendants in this case don't distribute cocaine?

73:6 A. Correct.

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81:18 - 81:23	Brown, Vic 07-08-2020 (00:00:22) 81:18 Q. Okay. And do you know whether your 81:19 experience in Kentucky would -- I mean, do you know 81:20 what the main drug threat was in Huntington and 81:21 Cabell County in 2000? The main prescription drug 81:22 threat in 2000? 81:23 A. I do not.	VM12a.22
84:01 - 84:14	Brown, Vic 07-08-2020 (00:00:44) 84:1 Q. There's a reference in this 2000 Annual 84:2 Report to doctor shopping. Are you familiar -- is 84:3 that a term you're familiar with? 84:4 A. Yes. 84:5 Q. What does that mean? 84:6 A. It's where an individual will go to 84:7 multiple doctors to obtain prescription medication 84:8 for either diversion or for consumption themselves. 84:9 Q. And is it illegal for -- is it illegal for 84:10 a -- for someone to doctor shop -- 84:11 A. Yes. 84:12 Q. -- to obtain controlled prescription 84:13 medications? 84:14 A. Yes.	VM12a.23
109:09 - 109:10	Brown, Vic 07-08-2020 (00:00:08) 109:9 Let's go back to Exhibit 2, please, 109:10 which is the 2000 Annual Report.	VM12a.24
109:23 - 111:03	Brown, Vic 07-08-2020 (00:01:37) 109:23 Q. Okay. And it says -- the last sentence of 109:24 that paragraph. "...the Mexican marijuana 110:1 trafficking organizations are heavily involved in 110:2 the importation and distribution of cocaine and 110:3 methamphetamine and, at times, heroin." 110:4 Did I read that correctly? 110:5 A. Yes. 110:6 Q. So heroin was present in Appalachia HIDTA 110:7 region as far back as 2000? 110:8 A. Certainly. 110:9 Q. And what about before 2000? 110:10 A. Certainly it was. 110:11 Q. And so at this time, it was HIDTA's 110:12 understanding that heroin was being trafficked into	VM12a.25

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	110:13 the region by Mexican trafficking organizations?	
	110:14 A. According to the assessment in this	
	110:15 document, yes.	
	110:16 Q. And those are criminal organizations, true?	
	110:17 A. Correct.	
	110:18 Q. So that would be heroin that was trafficked	
	110:19 into the region by criminal organizations from	
	110:20 another country?	
	110:21 A. Correct.	
	110:22 Q. And heroin is an opioid, isn't it?	
	110:23 A. Yes.	
	110:24 Q. And it's an illegal opioid?	
	111:1 A. Correct.	
	111:2 Q. And the defendants in this case don't	
	111:3 distribute heroin. True?	
111:06 - 111:10	Brown, Vic 07-08-2020 (00:00:14)	VM12a.26
	111:6 A. Correct.	
	111:7 Q. Correct? So the defendants in this case	
	111:8 wouldn't -- are not the source of the heroin that	
	111:9 ended up in the Appalachia HIDTA region. True?	
	111:10 A. True.	
111:18 - 112:12	Brown, Vic 07-08-2020 (00:01:18)	VM12a.27
	111:18 Q. Do you have Exhibit 28 in front of you,	
	111:19 Mr. Brown?	
	111:20 A. I do.	
	111:21 Q. And this is the 2010 HIDTA Annual Report?	
	111:22 A. Yes.	
	111:23 Q. So if you'll turn to page 8 --	
	111:24 A. I'm there.	
	112:1 Q. -- toward the bottom of that page, second	
	112:2 to the bottom paragraph, it says, "While heroin	
	112:3 poses a low overall threat to the Appalachia HIDTA	
	112:4 region, it represents a serious threat in select	
	112:5 Appalachia HIDTA areas. The threat posed by black	
	112:6 tar heroin is significant in the Huntington and	
	112:7 Charleston, West Virginia areas and will likely	
	112:8 increase throughout" "HIDTA."	
	112:9 So it was -- is it -- it was HIDTA's	
	112:10 understanding that heroin was a significant threat	
	112:11 to the City of Huntington as early as 2010?	

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127:14 - 127:16	112:12 A. Yes, according to this, that's correct. Brown, Vic 07-08-2020 (00:00:13)	VM12a.28
127:22 - 128:04	127:14 Q. Do you have any firsthand knowledge about 127:15 what drugs the current heroin users started on? 127:16 A. No. Brown, Vic 07-08-2020 (00:00:16)	VM12a.29
131:23 - 132:02	127:22 Q. And what is it in these documents that you 127:23 can point me to that tells us what drugs people 127:24 started on versus what drugs they're on now? 128:1 A. I don't have any information that what they 128:2 started on and what they're using now. I don't 128:3 think that's articulated in these documents 128:4 anywhere. Brown, Vic 07-08-2020 (00:00:16)	VM12a.30
132:05 - 132:07	131:23 Q. So as you sit here today, can you point us 131:24 to anything in the documents produced by HIDTA that 132:1 would tell us what drugs someone started on versus 132:2 what drugs they're on today? Brown, Vic 07-08-2020 (00:00:02)	VM12a.31
133:20 - 133:23	132:5 A. I cannot -- 132:6 Q. Go ahead. 132:7 A. -- place. Brown, Vic 07-08-2020 (00:00:15)	VM12a.32
134:24 - 135:02	133:20 Q. And we've talked about the fact that 133:21 the -- heroin is -- or a source of heroin is 133:22 Mexican drug trafficking organizations. True? 133:23 A. Yes. Brown, Vic 07-08-2020 (00:00:06)	VM12a.33
136:08 - 136:19	134:24 Q. And the distributor defendants don't 135:1 distribute heroin. True? 135:2 A. Correct. Brown, Vic 07-08-2020 (00:00:53)	VM12a.34
	136:8 Q. Do you have any reason to doubt the 136:9 accuracy of any of the -- these strategic -- the 136:10 Threat Assessments or the strategic reports that 136:11 HIDTA has produced in this case? 136:12 A. I do not. 136:13 Q. So we can rely on the information in these 136:14 reports as being accurate? 136:15 A. To the best of my knowledge, yes.	

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136:16	Q. And to the best of HIDTA's knowledge?	
136:17	A. Yes.	
136:18	Q. And then if you'll take a look at Exhibit	
136:19	38, please, which is the 2015 Annual Report.	
136:24 - 138:06	Brown, Vic 07-08-2020 (00:02:03)	VM12a.35
136:24	A. Okay.	
137:1	Q. All right. Page 4.	
137:2	A. All right.	
137:3	Q. So this tells us - and I'm in the first	
137:4	paragraph after the chart, the last sentence -	
137:5	"While the threat posed by heroin has plagued West	
137:6	Virginia since as early as 2007, all across the	
137:7	AHIDTA area, law enforcement are faced with the	
137:8	wreckage heroin trafficking and abuse has on their	
137:9	jurisdiction."	
137:10	So from this report, we know that	
137:11	heroin has been a threat in West Virginia since as	
137:12	early as 2007, correct?	
137:13	A. Yes.	
137:14	Q. And that at least as of 2015, law	
137:15	enforcement are faced with the wreckage heroin	
137:16	traffic and abuse has on their jurisdiction.	
137:17	Correct?	
137:18	A. Yes.	
137:19	Q. And then the last sentence on page 4 says,	
137:20	"Over the years, however, trafficking and abuse of	
137:21	heroin has made its presence known throughout the	
137:22	region, leaving AHIDTA AOR with an overall 'opioid'	
137:23	threat that is devastating the" communities.	
137:24	First, what is AOR?	
138:1	A. Area of responsibility.	
138:2	Q. All right. So this report, the 2015 Annual	
138:3	Report, attributes a significant portion of the	
138:4	opioid crisis to illegally-trafficked heroin.	
138:5	True?	
138:6	A. Yes.	
144:05 - 144:16	Brown, Vic 07-08-2020 (00:00:36)	VM12a.36
144:5	Q. Okay. So we've talked a lot about heroin.	
144:6	Let's turn now to fentanyl. So illicit fentanyl is	
144:7	-- is illicit fentanyl a threat in the Appalachia	

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	144:8 HIDTA Region?	
	144:9 A. Yes.	
	144:10 Q. And is it true that illegal street fentanyl	
	144:11 is trafficked by drug trafficking or by criminal	
	144:12 drug organizations?	
	144:13 A. Yes.	
	144:14 Q. All right. Not by the defendants in this	
	144:15 case?	
	144:16 A. Correct.	
145:02 - 145:10	Brown, Vic 07-08-2020 (00:00:46)	VM12a.37
	145:2 Q. All right. But fentanyl has been a threat	
	145:3 in the Appalachia HIDTA Region for at least the	
	145:4 past eight to ten years?	
	145:5 A. I would say it's been present, yes. At	
	145:6 least that amount of time. Maybe -- maybe longer.	
	145:7 Q. All right. And if you will look at	
	145:8 document -- Exhibit 54, which is the -- this is a	
	145:9 document entitled "Appalachia HIDTA State of West	
	145:10 Virginia Joint Fentanyl Project Report."	
145:16 - 145:23	Brown, Vic 07-08-2020 (00:00:20)	VM12a.38
	145:16 A. Okay.	
	145:17 Q. Are you familiar with the Joint Fentanyl	
	145:18 Project?	
	145:19 A. Yes. Yes.	
	145:20 Q. What is that?	
	145:21 A. Well, it's a project that the intel center	
	145:22 put together explaining, basically, where we are	
	145:23 with fentanyl in today's drug threat.	
146:23 - 147:23	Brown, Vic 07-08-2020 (00:01:12)	VM12a.39
	146:23 Q. All right. So then let's look at the	
	146:24 Executive Summary which is on a page that's not	
	147:1 numbered. It's the second page of the document	
	147:2 after the title page.	
	147:3 A. Okay, I'm there.	
	147:4 Q. And it says that -- in the first paragraph,	
	147:5 "The heroin epidemic has led to the introduction of	
	147:6 clandestinely produced fentanyl mixed in with"	
	147:7 "heroin which has resulted in increased overdose	
	147:8 deaths. The majority of drug users throughout the	
	147:9 state don't realize that fentanyl is being mixed in	

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	147:10 with the heroin by cartels in Mexico." 147:11 So it's Appalachia HIDTA's 147:12 understanding that cartels in Mexico are 147:13 responsible for mixing fentanyl with heroin and 147:14 trafficking into West Virginia? 147:15 A. That was the assessment by these two 147:16 analysts that prepared this document. Which -- 147:17 Q. Do you have -- 147:18 A. -- is accurate. There may be other 147:19 sources, but this is one that they have articulated 147:20 as being one of the major sources. 147:21 Q. All right. And you don't have any reason 147:22 to disagree with that? 147:23 A. I don't.	
148:08 - 148:17	Brown, Vic 07-08-2020 (00:00:38) 148:8 Q. And then farther down, it says - the second 148:9 to the last paragraph on that page - "Fentanyl 148:10 trafficking in West Virginia is a significant issue 148:11 in the larger metropolitan areas," and it says, "In 148:12 the five largest cities," including Huntington, 148:13 "task force officers are purchasing heroin mixed 148:14 with fentanyl." 148:15 So Appalachia HIDTA was aware as early 148:16 as 2016 that fentanyl was a problem in Huntington? 148:17 True?	VM12a.40
148:19 - 148:19	Brown, Vic 07-08-2020 (00:00:01) 148:19 A. Yes.	VM12a.41
157:21 - 158:07	Brown, Vic 07-08-2020 (00:00:37) 157:21 Q. Okay. I asked you a couple of questions 157:22 ago about the Fentanyl Response Strategy and 157:23 whether it was initiated because of an increase in 157:24 fentanyl use and deaths, and you're aware, aren't 158:1 you, that the Appalachia HIDTA region has 158:2 experienced an increase in deaths by fentanyl? 158:3 A. Yes. 158:4 Q. Isn't that true? 158:5 A. Yes. 158:6 Q. And the data supports that? 158:7 A. Correct.	VM12a.42
159:09 - 159:09	Brown, Vic 07-08-2020 (00:00:03)	VM12a.43

Page/Line	Source	ID
159:16 - 159:23	<p>159:9 Q. Okay. Let's look at Exhibit 53.</p> <p>Brown, Vic 07-08-2020 (00:00:31)</p> <p>159:16 Q. Do you have that in front of you?</p> <p>159:17 A. Yes.</p> <p>159:18 Q. So this is an e-mail dated April 13, 2018</p> <p>159:19 from Yolanda Sowards at Appalachia HIDTA to Michael</p> <p>159:20 Kilkenny. Do you know Yolanda Sowards?</p> <p>159:21 A. I do. She is the current public health</p> <p>159:22 analyst assigned to the Overdose Response Strategy</p> <p>159:23 with Appalachia HIDTA.</p>	VM12a.44
160:10 - 160:13	<p>Brown, Vic 07-08-2020 (00:00:18)</p> <p>160:10 Q. Well, it appears that Ms. Sowards is</p> <p>160:11 communicating drug overdose statistics for Cabell</p> <p>160:12 County. Is that correct?</p> <p>160:13 A. Yes, it appears to be so, yes.</p>	VM12a.45
163:01 - 163:11	<p>Brown, Vic 07-08-2020 (00:00:36)</p> <p>163:1 Q. Right. So we know that -- well, it tells</p> <p>163:2 us, there are 183 All Drug Overdose Deaths in 2017</p> <p>163:3 in Cabell County, 166 of those had at least one</p> <p>163:4 opioid, and then it appears that 145 of those</p> <p>163:5 overdose deaths involved fentanyl.</p> <p>163:6 A. Exactly.</p> <p>163:7 Q. True?</p> <p>163:8 A. Yes.</p> <p>163:9 Q. And 62 of those overdose deaths involved</p> <p>163:10 heroin. True?</p> <p>163:11 A. Correct.</p>	VM12a.46
169:16 - 169:18	<p>Brown, Vic 07-08-2020 (00:00:10)</p> <p>169:16 Q. Are there people abusing heroin or other</p> <p>169:17 illicit opioids today that started with heroin and</p> <p>169:18 never used prescription opioids?</p>	VM12a.47
169:20 - 169:24	<p>Brown, Vic 07-08-2020 (00:00:14)</p> <p>169:20 A. I have no way of knowing that precisely. I</p> <p>169:21 don't have any direct information of that.</p> <p>169:22 Q. Is that -- I think we've talked about this</p> <p>169:23 already. That's not data that Appalachia HIDTA</p> <p>169:24 keeps, what --</p>	VM12a.48
170:02 - 170:03	<p>Brown, Vic 07-08-2020 (00:00:05)</p> <p>170:2 Q. -- what drug people started on and what</p> <p>170:3 drug they are on today?</p>	VM12a.49

Page/Line	Source	ID
170:07 - 170:10	Brown, Vic 07-08-2020 (00:00:18) 170:7 A. Correct. I have no way of knowing. 170:8 Q. And are there people abusing prescription 170:9 opioids today who were never prescribed opioids 170:10 lawfully?	VM12a.50
170:12 - 170:15	Brown, Vic 07-08-2020 (00:00:09) 170:12 A. I don't have any direct information to 170:13 that. I'm -- my personal opinion is I'm sure there 170:14 are, but I have no direct knowledge of that or 170:15 information related to that.	VM12a.51
171:21 - 172:18	Brown, Vic 07-08-2020 (00:00:53) 171:21 Q. All right, Mr. Brown, I want to talk with 171:22 you for a few minutes about HIDTA funding. 171:23 A. Okay. 171:24 Q. You told me earlier that HIDTA is funded by 172:1 the Office of National Drug Control Policy? 172:2 A. Correct. 172:3 Q. Is that true? 172:4 A. Yes. 172:5 Q. Does all of HIDTA -- does 100 percent of 172:6 HIDTAs -- of Appalachia HIDTA's come from the 172:7 Office of National Drug Control Policy? 172:8 A. It does. 172:9 Q. Is -- do you receive -- does Appalachia 172:10 HIDTA receive any state funding? 172:11 A. We do not. 172:12 Q. Any local funding? 172:13 A. No. No other source other than Office of 172:14 National Drug Control Policy. 172:15 Q. All right. So the City of Huntington and 172:16 Cabell County have not contributed to HIDTA -- 172:17 Appalachia HIDTA funding? 172:18 A. No.	VM12a.52
193:02 - 193:13	Brown, Vic 07-08-2020 (00:00:31) 193:2 Q. So we discussed earlier the Huntington Drug 193:3 Task Force -- 193:4 A. Yes. 193:5 Q. -- correct? 193:6 A. Yes. 193:7 Q. What was HIDTA's role in the FBI version of	VM12a.53

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	193:8 that task force?	
	193:9 A. Well, our role is the same in any	
	193:10 initiative, is to provide funding to the initiative	
	193:11 to provide overtime funds for the purchase of	
	193:12 evidence, funds for travel or funds for equipment	
	193:13 and training.	
193:14 - 193:15	Brown, Vic 07-08-2020 (00:00:03)	VM12a.54
	193:14 It's the same for all of our task	
	193:15 forces.	
211:16 - 211:18	Brown, Vic 07-08-2020 (00:00:09)	VM12a.55
	211:16 Q. Mr. Brown, if you would turn to	
	211:17 Exhibit 47, which is the 2019 HIDTA Drug Threat	
	211:18 Assessment.	
212:07 - 212:23	Brown, Vic 07-08-2020 (00:00:51)	VM12a.56
	212:7 Q. You got it?	
	212:8 A. Yes.	
	212:9 Q. All right. Would you please turn to page	
	212:10 5, the Executive Summary?	
	212:11 A. Okay.	
	212:12 Q. All right. And in the third bullet point	
	212:13 on page 5, it says "Crystal methamphetamine (ICE)	
	212:14 continues to be one of the largest threats in the	
	212:15 AHIDTA area. In 2018, the AHIDTA seized more than	
	212:16 500 kilograms of ICE, an increase of nearly 82	
	212:17 percent over 2017."	
	212:18 Did I read that correctly?	
	212:19 A. Yes.	
	212:20 Q. So according to Appalachia HIDTA, crystal	
	212:21 meth is one of the largest current threats in the	
	212:22 Appalachia HIDTA Region. True?	
	212:23 A. Yes.	
234:04 - 234:17	Brown, Vic 07-08-2020 (00:00:43)	VM12a.57
	234:4 Q. Is there anything	
	234:5 about the location of the Appalachia HIDTA Region	
	234:6 or its nature - economics, anything - that makes it	
	234:7 uniquely susceptible to illegal drugs?	
	234:8 A. Oh, it's a poorer area, obviously. Most of	
	234:9 the Appalachia region is one of the poorest in the	
	234:10 nation. A lot of unemployment. A lot of	
	234:11 disability cases. Many of those disability cases,	

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	234:12 when they occurred, they were put on opioids, and 234:13 some of those resulted into addiction. 234:14 I think it's just a -- it's a lot of 234:15 things -- perfect storm came together for the 234:16 Appalachian region to be one of the hardest areas 234:17 hit in the nation for its use.	
235:02 - 235:03	Brown, Vic 07-08-2020 (00:00:08)	VM12a.58
	235:2 Q. Let's look quickly at the 235:3 Exhibit 18, which is the 2006 Annual Report.	
236:08 - 237:12	Brown, Vic 07-08-2020 (00:01:53)	VM12a.59
	236:8 Q. All right. And then on page 10, the 236:9 paragraph before Section 5 says, "The rural 236:10 counties of the AHIDTA Region are plagued by high 236:11 rates of unemployment, poverty, adult illiteracy, 236:12 fragmented families, teenage pregnancy, public 236:13 corruption and an established tradition of 236:14 bootlegging moonshine. Due to these conditions, 236:15 illicit drug activities are sometimes accepted and 236:16 even encouraged by members of the local population, 236:17 a situation similar to that found in 236:18 poverty-stricken inner city areas." 236:19 Did I read that correctly? 236:20 A. Yes. 236:21 Q. All right. So this is from 2006. But is 236:22 it your understanding that those conditions have 236:23 persisted until today? 236:24 A. I would agree with that. And yes, mostly 237:1 it all still holds true to today. 237:2 Q. All right. And those conditions make the 237:3 Appalachia HIDTA region susceptible to illegal drug 237:4 activity? 237:5 A. I certainly believe that's one of the 237:6 factors that do contribute to that, yes. 237:7 Q. All right. And those factors have nothing 237:8 to do with the defendants in this case? 237:9 A. Correct. 237:10 Q. All right. And then let's look quickly at 237:11 Exhibit 47, which is the 2019 Drug Threat 237:12 Assessment.	
237:23 - 238:13	Brown, Vic 07-08-2020 (00:00:52)	VM12a.60

Page/Line	Source	ID
237:23	Q. Okay. So page 8. Right after --	
237:24	underneath Appalachia HIDTA Geographic Area --	
238:1	A. Yes.	
238:2	Q. -- it says that the Appalachia -- "The	
238:3	Appalachia HIDTA states are geographically situated	
238:4	within easy driving distance to an abundance of	
238:5	major metropolitan areas throughout the eastern,	
238:6	southeastern and midwest regions of the United	
238:7	States. The ease of access by roadway into,	
238:8	throughout and out of major cities known to be	
238:9	significant drug distribution points in the United	
238:10	States creates an ideal situation for DTOs to	
238:11	conduct business in the AHIDTA region."	
238:12	Did I read that correctly?	
238:13	A. Yes.	
239:10 - 239:17	Brown, Vic 07-08-2020 (00:00:34)	VM12a.61
239:10	Q. So is it true that it is Appalachia HI --	
239:11	Appalachia HIDTA's understanding that the proximity	
239:12	of Appalachia HIDTA to multiple known drug	
239:13	distribution points is a factor that contributes to	
239:14	illegal drug activity in the region?	
239:15	A. Yes, it is a factor.	
239:16	Q. And those are conditions that have nothing	
239:17	to do with the defendants in this case. True?	
239:19 - 239:19	Brown, Vic 07-08-2020 (00:00:01)	VM12a.62
239:19	A. Yes.	
255:01 - 255:16	Brown, Vic 07-08-2020 (00:00:49)	VM12a.63
255:1	Q. And do we have a time frame that we could	
255:2	give for this migration of pills from Florida into	
255:3	Appalachia?	
255:4	A. Well, like I said, we worked -- when I was	
255:5	working with the Kentucky State Police - and since	
255:6	I have been at HIDTA - all of our initiatives and	
255:7	agencies have worked well with surrounding states	
255:8	to address the issue.	
255:9	I think early 2000s up and through	
255:10	2010-2012, we had numerous individuals from all	
255:11	Appalachian states traveling not only to Florida,	
255:12	but to Georgia, to Tennessee, to any other	
255:13	jurisdiction where they could circumvent their own	

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255:14	state's prescription monitoring program to obtain	
255:15	prescription medication and thereby bring back and	
255:16	divert those.	
260:20 - 262:18	Brown, Vic 07-08-2020 (00:02:31)	VM12a.64
260:20	Q. We will turn now to Exhibit 5, which is the	
260:21	2001 Threat Assessment.	
260:22	A. Okay, I have that.	
260:23	Q. Okay. And we are going to start -- so once	
260:24	again in 2001, at this time, the principal mission	
261:1	of AHIDTA was to focus on marijuana issues, but you	
261:2	did include all drug trends in your report?	
261:3	A. That's correct.	
261:4	Q. Okay. And so on page 4 of the document, in	
261:5	the paragraph that begins, "The abuse and resale	
261:6	for abuse of prescription medications within the	
261:7	Appalachia HIDTA is also a significant problem."	
261:8	And then it goes on to talk about,	
261:9	"Investigative agencies within the three states	
261:10	target physicians who prescribe medications to	
261:11	abusers who "doctor shop.""	
261:12	Now, West Virginia's one of those	
261:13	states, right?	
261:14	A. That's correct, yes.	
261:15	Q. And this is still a significant problem in	
261:16	2001?	
261:17	A. Yes.	
261:18	Q. The -- at the end of that paragraph, "The	
261:19	"patients" sell the controlled substance "on the	
261:20	streets" for incredible profits, and abuse the	
261:21	substances themselves."	
261:22	Was that a trend that was known to be	
261:23	going on in the Appalachia HIDTA Region in 2000 and	
261:24	2001?	
262:1	A. It was, yes.	
262:2	Q. Do you have an idea of the scale of the	
262:3	problem at that time in terms of what it would have	
262:4	been like in the years prior?	
262:5	A. Well, that's during the time that it was	
262:6	actually starting to grow exponentially. I would	
262:7	say this was the -- still in the beginning stages	

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262:8 before it climaxed in 2010 or so, plus or minus a
262:9 year.

262:10 But it was certainly a pervasive

262:11 problem. The reason the profits were exponential

262:12 was most of these prescriptions were paid for by

262:13 Medicaid/Medicare, so therefore when they were sold

262:14 on the street, it was 100 percent profit for the

262:15 individual selling it.

262:16 Q. And were these prolifically available for

262:17 sale on the illicit market?

262:18 A. They were, yes, very much so.

263:19 - 264:24

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VM12a.65

263:19 Q. Now, when counsel for McKesson asked you

263:20 questions earlier about whether there was any

263:21 connection that AHIDTA had ever found between

263:22 prescription medications and heroin -- do you

263:23 remember those questions?

263:24 A. I do.

264:1 Q. Did she show you anything in the documents

264:2 where AHIDTA reported on that connection?

264:3 A. Not that I recall, no, sir.

264:4 Q. As far as to what types of prescription

264:5 medications are being abused, did you recall that

264:6 -- I guess we did have some questions that singled

264:7 out the opioid, right?

264:8 A. I believe so. I don't remember the exact

264:9 dialogue, but yes.

264:10 Q. Well, let's go to page 3 of the document,

264:11 and it's talking about -- under the section of

264:12 major -- Number of Major Drug Trafficking

264:13 Organizations. And then the fifth paragraph down

264:14 in that section, Executive Director Brown --

264:15 A. Yes.

264:16 Q. -- is there a description by AHIDTA of what

264:17 prescription medications were being most frequently

264:18 diverted?

264:19 A. It mentions OxyContin and hydrocodone.

264:20 Q. And does it describe anything about whether

264:21 this is a growing issue in the region?

264:22 A. It does. It says -- "within the Appalachia

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	264:23 HIDTA, there are also a significant and growing 264:24 problem," yes.	
285:13 - 285:19	Brown, Vic 07-08-2020 (00:00:24) 285:13 Q. You were asked questions about some -- 285:14 some of these reports and what's in them, and I 285:15 want to just go back and make sure that we're all 285:16 not -- not missing anything. 285:17 You were asked about -- this is Exhibit 285:18 2, the 2000 Annual Report. 285:19 A. Yes.	VM12a.66
286:09 - 288:05	Brown, Vic 07-08-2020 (00:02:42) 286:9 Q. And in fact, this says that, "The three 286:10 states that constitute the Appalachia HIDTA are 286:11 experiencing increase in the methamphetamine 286:12 threat. Authorities" report -- authorities in 286:13 Tennessee report that the availability of 286:14 methamphetamine in their state has increased 286:15 ten-fold over the past several years. An upsurge 286:16 in methamphetamine seizures and lab discoveries has 286:17 also been reported in Kentucky and West Virginia." 286:18 I read that accurately, didn't I? 286:19 A. Yes. 286:20 Q. All right. And under Trends, it also 286:21 discuss -- another trend that was seen was Global 286:22 Influences. "... Mexican marijuana trafficking 286:23 organizations are heavily involved in the 286:24 importation and distribution of cocaine and 287:1 methamphetamine and, at times, heroin." 287:2 A. That's correct. 287:3 Q. Correct? 287:4 A. Yes. 287:5 Q. So those were all trends that Appalachia 287:6 HIDTA was seeing in 2000? 287:7 A. That's correct. 287:8 Q. Correct, sir? 287:9 All right. And then if -- you were 287:10 asked some questions about Exhibit 5, which is the 287:11 2001 Threat Assessment -- 287:12 A. Okay, I have that. 287:13 Q. All right. And you were asked questions	VM12a.67

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287:14 about the prescription drug parts, but on page 4,
 287:15 this report tells us that other than marijuana --
 287:16 and I guess page -- page 3 talks about the issues
 287:17 with marijuana.
 287:18 And then on page 4, it says, "Other
 287:19 than marijuana, cocaine and crack cocaine
 287:20 constitute the major drugs seized in Appalachia
 287:21 HIDTA with a combination percentage of 51%. Crack
 287:22 cocaine, in particular, first infiltrates
 287:23 metropolitan areas and then infiltrates more rural
 287:24 areas."

288:1 So at this time, marijuana, cocaine and
 288:2 crack cocaine are major drugs of issue in
 288:3 Appalachia HIDTA region. Correct?
 288:4 A. That is correct. 2001, that's -- that was
 288:5 the case, yes.

288:15 - 288:19

Brown, Vic 07-08-2020 (00:00:14)

VM12a.68

288:15 Q. All right. And then if you'll look -- look
 288:16 at Exhibit 28 which you were also asked about the
 288:17 opioid portion of that -- this is the Calendar Year
 288:18 2010 Annual Report --

288:19 A. Okay.

288:23 - 290:06

Brown, Vic 07-08-2020 (00:01:45)

VM12a.69

288:23 Q. -- this tells us -- you were asked about
 288:24 the prescription opioid part, but it also tells us
 289:1 in the third paragraph -- and this is 2 -- what did
 289:2 we say? 2009 Threat Assessment.
 289:3 "After declining in scope in recent
 289:4 years, methamphetamine production is again on the
 289:5 rise. The increase is largely the result of
 289:6 individuals and criminal groups adapting to state
 289:7 and federal pseudoephedrine sales restrictions and
 289:8 obtaining the quantities of the essential chemical
 289:9 necessary to produce their desired amount of" meth.
 289:10 After a 44 percent reduction in lab seizures"
 289:11 "from" 2006 to 2007 Appalachia HIDTA "state and
 289:12 local law enforcement agencies in" 2008
 289:13 "experienced a 45 percent increase in clandestine
 289:14 laboratory related hazards, encountering those
 289:15 hazards" on "average of seven times a week."

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289:16 Correct, sir?

289:17 A. Yes.

289:18 Q. And then it also says that, "While heroin

289:19 poses a low overall threat to the Appalachia HIDTA

289:20 region, it represents a serious threat in select

289:21 Appalachia HIDTA regions" including Huntington.

289:22 So at this time, in addition to meth,

289:23 heroin is also a threat.

289:24 A. Correct.

290:1 Q. Correct, sir?

290:2 A. Yes.

290:3 Q. And crack cocaine, according to this

290:4 report, poses a significant threat to the

290:5 Appalachia HIDTA region. Correct, sir?

290:6 A. Yes. In some areas.

292:03 - 292:09

Brown, Vic 07-08-2020 (00:00:37)

VM12a.70

292:3 Q. And then you were asked about the 2019 Drug

292:4 Threat Assessment which is Exhibit 47 --

292:5 A. Yes.

292:6 Q. And that report, page 5, tells us that

292:7 crystal meth continues to be one of the largest

292:8 threats in the Appalachia HIDTA Region. Correct?

292:9 A. It does, yes.

292:24 - 293:20

Brown, Vic 07-08-2020 (00:01:11)

VM12a.71

292:24 Q. "The AHIDTA region continues to face

293:1 considerable threats from cocaine, fentanyl and

293:2 marijuana/cannabis - to include cannabis-derived

293:3 products, THC edibles and CBD."

293:4 A. Yes.

293:5 Q. That was a finding of Appalachia HIDTA in

293:6 2019, correct?

293:7 A. Yes.

293:8 Q. And you were asked about the fact that

293:9 there is a section in the emerging threats portion

293:10 of the 2019 report that deals with controlled

293:11 prescription drugs. And to be fair, there are also

293:12 sections in the Emerging Threats portion of the

293:13 2019 report that deals with crystal meth, on page

293:14 12 -- true?

293:15 A. Yes.

Page/Line	Source	ID
293:16	Q. And there's a section on page 15 that deals	
293:17	with cocaine as an emerging threat?	
293:18	A. Correct.	
293:19	Q. True?	
293:20	A. Yes.	
298:13 - 298:16	Brown, Vic 07-08-2020 (00:00:10)	VM12a.72
298:13	Q. How many pills distributed by the	
298:14	defendants in this case were diverted in Huntington	
298:15	or Cabell County?	
298:16	A. I'd have no idea.	
298:18 - 299:12	Brown, Vic 07-08-2020 (00:01:20)	VM12a.73
298:18	Q. And can you identify a single shipment of	
298:19	opioid pills by the distributors in this case that	
298:20	was diverted in a HIDTA region?	
298:21	A. No, I cannot.	
298:22	Q. And in looking at these Annual Reports --	
298:23	well, you've told us that heroin has always been a	
298:24	threat in the Appalachia HIDTA region. True?	
299:1	A. Yes.	
299:2	Q. And heroin was a threat in the Appalachia	
299:3	HIDTA region before the increase in prescription	
299:4	opioid diversion and abuse that you've described	
299:5	today. True?	
299:6	A. Yes. True.	
299:7	Q. And you don't know and Appalachia HIDTA	
299:8	does not know what portion of heroin users started	
299:9	with heroin?	
299:10	A. No.	
299:11	Q. True?	
299:12	A. True.	
299:18 - 300:05	Brown, Vic 07-08-2020 (00:00:34)	VM12a.74
299:18	Q. Do you know what percentage of heroin users	
299:19	started with another illegal drug?	
299:20	A. No, I have no idea.	
299:21	Q. Do you know what percentage of heroin users	
299:22	started with prescription opioids?	
299:23	A. No.	
299:24	Q. And the defendants in this case don't	
300:1	distribute heroin, do they?	
300:2	A. They do not.	

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300:17 - 300:24	<p>300:3 Q. Heroin is trafficked into Appalachia HIDTA 300:4 region by criminal drug trafficking organizations. 300:5 A. Correct.</p> <p>Brown, Vic 07-08-2020 (00:00:43)</p> <p>300:17 Q. All right, thank you. And do you 300:18 understand that the defendants do not have any role 300:19 in dispensing or use of prescription opioids after 300:20 they reach a pharmacy? 300:21 A. Yes. 300:22 Q. And diversion -- both diversion and the 300:23 unlawful use of prescription opioids happen after 300:24 the defendants' role in the chain is over.</p> <p>Brown, Vic 07-08-2020 (00:00:04)</p> <p>301:3 Q. True? 301:4 A. Yes.</p>	<p>VM12a.75</p> <p>VM12a.76</p>

Defendants' Counters = 00:45:22

Plaintiffs' Completeness = 00:06:33

Total Time = 00:51:55